RCRA Contingency Plan

AZIO IA O I

And

Hazardous Materials Emergency Response Plan

Prepared for:

Arizona Electric Power Cooperative, Inc.

Apache Generating Station



P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

U.S. EPA Region 9 RCRA Compliance/Emergency Response 75 Hawthorne Street San Francisco, CA 94105

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

I invite representatives of your agency to visit Apache Station to learn about the facility and the emergency response procedures.

Please call me at (520) 384-4256 with any questions or to arrange for a site visit.

Sincerely,

Mark W. Schwirtz

Senior Vice President & Chief Operating Officer

Encl.

c/ Local Emergency Planning Committee

Cochise County Sheriff Department

Northern Cochise Community Hospital

Department of Public Safety Helicopter

University Medical Center – Poison Control and Air Care

Critical Air

Life Net Helicopter

Arizona Department of Environmental Quality - Phoenix and Tucson offices

Arizona Division of Emergency Management

Sunsites Fire Department

RCRA CONTINGENCY PLAN

AND

HAZARDOUS MATERIALS EMERGENCY RESPONSE PLAN

ARIZONA ELECTRIC POWER COOPERATIVE, INC. APACHE GENERATING STATION

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1.0 GENERAL PURPOSE AND SCOPE OF PLAN

This RCRA Contingency Plan and Hazardous Materials Emergency Response Plan (Contingency Plan) covers Arizona Electric Power Cooperative, Inc. (AEPCO's) Apache Generating Station (Apache Station). The facility is subject to 40 CFR 265, Subparts C and D, and Arizona Revised Statute (ARS) 26-347 because the facility is occasionally classified as a Large Quantity Generator (LQG) of hazardous waste. This plan outlines the actions facility personnel must take to safely, effectively, and expeditiously respond to fires, explosions, or any sudden and unplanned release of hazardous waste or hazardous materials stored in bulk quantities. In addition, this plan covers the reporting requirements under federal, state and local regulations.

Copies of the Contingency Plan are kept at Apache Station in the Operations Manager's office, the offices of senior managers, the environmental file room, Safety office and the Security office. In addition to on-site copies, the Contingency Plan has been submitted to the appropriate government agencies as well as emergency services providers.

The Contingency Plan discusses the following:

- The facility and the processes that generate hazardous waste
- Hazardous waste generated, the generation points and hazardous waste storage areas
- Hazardous materials stored in bulk quantities
- Emergency preparedness and personnel responsible for emergency response
- Potential emergencies
- Emergency response procedures
- Arrangements with emergency response agencies
- Emergency equipment
- Training
- Amendments to the Contingency Plan.

1.1 APACHE STATION DESCRIPTION

The following generating units operate at Apache Station:

GENERATING UNIT	FUEL
Steam Unit 1	Natural Gas/Fuel Oil
Steam Unit 2	Coal/Natural Gas
Steam Unit 3	Coal/Natural Gas
Gas Turbine 1	Natural Gas/Fuel Oil
Gas Turbine 2	Natural Gas/Fuel Oil
Gas 'Turbine 3	Natural Gas/Fuel Oil
Gas Turbine 4	Natural Gas/Fuel Oil

Apache Station is an electric generating facility with a gross generating capacity of 560 megawatts. The facility provides electric power for consumer/owners as a non-profit electric generation cooperative. The facility has three steam generating units and four gas turbine units, and generates power through combustion of coal, fuel oil, and natural gas. Apache Station is located approximately 8 miles south of Interstate 10 on Highway 191. Facility activities include operating, maintaining, and supporting the generating units described above. The facility operates 24 hours per day, 7 days a week.

Contract guards provide security at the facility 24 hours per day. Chain link fence spanning the perimeter of the property restricts access to the facility.

Maintenance activities generate various waste streams considered hazardous by federal and state regulations. Apache Station is normally a Conditionally Exempt Small Quantity Generator (CESQG), although is occasionally a Large Quantity Generator (LQG). The EPA ID number is AZD070250469.

2.0 HAZARDOUS WASTE AND HAZARDOUS MATERIALS DESCRIPTION

Apache Station produces hazardous waste from activities related to maintenance and operation of various types of equipment. The following describes hazardous wastes generated, as well as locations and generating points. In addition, Apache Station has bulk storage of hazardous materials, which would become hazardous waste in the event of a spill or release. The Reportable Quantity (RQ) for each of the materials is indicated in Sections 2.1 and 2.4. The RQ represents the threshold quantity that must be <u>immediately</u> reported to a regulatory agency if spilled (See Section 4.3 for more details). In addition, any quantity of hazardous waste spilled that could threaten human health or the environment <u>off-site</u> must be immediately reported to regulatory agencies.

Spill kits are located at or nearby all hazardous waste and hazardous materials storage areas to aid in spill response.

2.1 HAZARDOUS WASTE ACCUMULATION AREAS

Hazardous waste can be generated throughout the facility and is managed in satellite accumulation areas located near the point of waste generation. Once a satellite accumulation container is full, the container is dated and transferred to the RCRA/TSCA/Used Oil accumulation area. The drums are logged into a waste generation logbook and prepared for shipping to a permitted treatment, storage and disposal (TSD) facility. Table 1 summarizes the hazardous wastes typically generated, their locations and the reportable quantity (RQ) for each waste.

TABLE 1 HAZARDOUS WASTE GENERATED

HAZARDOUS WASTE STREAM	WASTE GENERATION AREA	EPA IDENTIFICATION NUMBER	REPORTABLE QUANTITY (RQ)
Paints/Solvents Flammable Liquids	Facility-wide	D001, F001, F005 - Paint/Solvent	Any quantity that can affect human health or the environment off-site. 10 lbs on-site release.
Lead-based paint	Facility-wide	D008 - Lead	Any quantity that can affect human health or the environment off-site. 10 lbs on-site release.
Mercury- containing materials	Facility-wide	U151, D009 - Mercury	Any quantity that can affect human health or the environment off-site. 1 lb on-site release.
Drip Gas	El Paso Natural Gas Metering Station	D001, D018 - Solvent, Benzene	Any quantity that can affect human health or the environment off-site. 10 lbs on-site release.

2.2 RCRA/TSCA/USED OIL ACCUMULATION AREA

The RCRA/TSCA/Used Oil accumulation area is situated south of the main power generating facility. The area is concrete-lined and curbed for containment. Two self-contained buildings are located within the concrete containment. The south building is used for RCRA wastes and the north building is used for TSCA waste storage. The buildings are equipped with lights, fire suppression system, secondary containment and a Gai-Tronics phone. Used oil is stored within containment north of the TSCA building. Wastes entering this area are inventoried and expeditiously sent for disposal or recycling to an off-site licensed facility.

2.3 RECYCLING AREA

This area is located between Steam Units 1 and 2 and receives hazardous materials that are recycled off-site. Materials include EHC fluid, fluorescent lights, batteries, mercury switches and lighting ballast. Only the mercury switches contain sufficient quantities of hazardous materials that, if released, could exceed an RQ.

2.4 BULK HAZARDOUS MATERIALS STORAGE

Table 2 lists hazardous materials stored in bulk and the reportable quantity (RQ) for each material. The RQ is the amount of material spilled or released that requires immediate reporting to regulatory agencies (See Section 4.3). Table 2 also notes if a substance is classified as an Extremely Hazardous Substance for reporting purposes.

TABLE 2
BULK HAZARDOUS MATERIALS STORED

Product	Location and Quantity Stored	Reportable Quantity (RQ)
Sulfuric Acid	Cooling Towers 1, 2 and 3 (5,000 and 15,000 gallon tanks)	Extremely Hazardous Substance 1,000 lbs (70 gallons)
	Reverse Osmosis (RO) Bldg (5,000 gallon tank)	
Caustic – 50% Sodium Hydroxide Solution	Reverse Osmosis (RO) Bldg (5,000 gallon tank, modified to hold only 1,500 gallons)	1,000 lbs (157 gallons)
Bleach – 12% Sodium Hypochlorite Solution	Cooling Towers 1, 2 and 3 (2,000 gallon tanks)	100 lbs (83 gallons)
PCBs in Transformer Oil (0.055% Solution)	Gas Turbine 3 Auxiliary Transformer* (633 gallons)	1 pound (235 gallons)
Aqua Ammonia (19% Solution)	Gas Turbine 4 (9,200 gallon tank)	1,000 pounds (680 gallons)

^{*} PCB-containing oil is scheduled for removal from GT3 transformer in May 2003.

3.0 EMERGENCY COORDINATORS AND RESPONSE PERSONNEL

The Emergency Coordinator (EC) has responsibility for coordinating internal emergency response activities at Apache Station and is available at all times. As required by 40 CFR 265.52, the EC is familiar with all aspects of this plan, all operations and activities at the facility, the locations and characteristics of all the hazardous wastes and chemicals handled, the location of emergency equipment, the location of facility records and the facility layout. The EC has the authority to direct emergency activities, including personnel and equipment. In the event of a hazardous waste or material spill or release, the EC implements this plan.

Apache Station's Emergency Response Team (ERT) consists of members who can respond to spills, fire, high-angle rescue and medical emergencies. The HazMat members of the ERT, as well as certain environmental and safety personnel, are trained to identify, respond to, mitigate, and remediate spills from hazardous materials or waste. The EC is authorized to direct the ERT to respond to spills, fires, rescues and medical emergencies.

Table 3 lists the names and telephone numbers of the ECs and their alternates. Outside spill response contractors and agencies are also listed.

TABLE 3
EMERGENCY COORDINATORS PHONE CONTACTS*

Primary Emergency Coordinators (Operations Managers)	Danny Brown Daniel Tapia Jeffrey Guinane Edward Torres	Work: 6511 or 6555 Gai-Tronics Channel 3 Two-Way Radio (Operations channel)
	Rockne Hegel	Work: 6524
First Alternate Coordinator	Mike Nelson	Pager: 520-218-1523 Work: 6509
Second Alternate Coordinator	Jim Andrew	Pager: 520-218-2253 Work: 6517
Third Alternate Coordinator	Marc Richardson	Cell: 520-403-3372 Work: 6522
Spill Response Contractor	CTI	800-634-4828
On-Site Emergency Assistance	ADEQ	602-207-2330
Emergency Response Agencies	See Section 6	See Section 6

^{*} The EC also has access to the home phone numbers and addresses of all ECs and the alternate coordinators.

4.0 EMERGENCY RESPONSE PROCEDURES

The following actions are taken during emergencies involving fire and explosion, or any spill of a hazardous waste or hazardous material.

4.1 FIRE AND EXPLOSION EMERGENCY RESPONSE

Employee Responsibility

An employee, upon detecting a fire that cannot be extinguished with a portable fire extinguisher, shall immediately contact the Control Room by Gai-Tronics phone (Channel 3), two-way radio (operations channel), or telephone (6511). The person receiving the emergency call will contact the Operations Manager (the EC). The employee reporting the incident should provide their name, location, nature of the fire or explosion, and whether there are injuries involved.

Emergency Coordinator Responsibilities

- Direct second-in-command to assume responsibility for continued facility operation or orderly shutdown
- Assess the emergency for affects to human health and the environment and determine location
- If a medical emergency, activate the Emergency Medical Technicians (EMTs)
- Activate the fire alarm system and contact the Security Office
- Determine if the situation requires evacuation of the local area, or the entire plant site
- If warranted, notify personnel to vacate the facility per evacuation plan (See Appendix 1)
- Notify management
- Identify the character, source, amount, and extent of any released hazardous material
- Determine the appropriate remediation action by reviewing the MSDS. Copies of the MSDS are kept in the main control room, safety office and other right-to-know stations.
- If warranted, contact off-site emergency response personnel (See Table 3 for outside contractor and/or Section 6 for agencies)
- Take action to shut-off electrical power and any gas in the vicinity of the fire (refer to Gas Line Procedure)
- Commit any and all resources and direct activities to implement this Contingency Plan

- Immediately contact regulatory agencies if hazardous material Reportable Quantity (RQ) is exceeded (See Tables 1 and 2 and Section 4.3).
- Immediately contact regulatory agencies if hazardous waste incident can threaten human health or environment <u>outside</u> the facility (See Table 1 and Section 4.3).
- Direct employees to place absorbent materials around drains
- Fill out Incident Report (See Appendix 2)
- Ensure that waste is cleaned up properly and emergency equipment is cleaned and fit for its intended use prior to resuming operations in the affected area
- For a hazardous waste incident, contact ADEQ (See Section 4.3) for notification of resumed operations <u>prior</u> to resumption
- Follow instructions given by off-site emergency response authorities
- Send Incident Report to Manager of Regulatory Affairs and Strategic Projects

Fire Brigade Members Responsibilities

- Upon hearing an alarm and fire emergency announcement, leave work as soon as safely possible
- Proceed swiftly and safely to the firehouse
- Acquire turn-out clothing and self-contained breathing apparatus (SCBA) and proceed to the fire emergency staging area

Security Personnel Responsibilities

- Maintain site security
- Contact Safety
- Provide EMT support, if directed.
- If directed by the EC, call 911 and provide the following information:
 - > Reporter and facility name
 - > Location and directions to facility
 - > Preliminary emergency assessment information

- > Meeting location for emergency equipment at facility
- > If needed, request outside medical help

Safety Personnel Responsibilities

- Provide EMT support
- Maintain SCBA and respirator equipment
- If required, contact regulatory agencies (See Section 4.4)
- Contact Public Information Officer
- Monitor scene to ensure proper safety practices are followed

4.2 SPILL EMERGENCY RESPONSE

Employee Responsibility

An employee, upon discovering a spill, must immediately contact the Control Room by Gai-Tronics phone (Channel 3), two-way radio (operations channel), or telephone (6511). The person receiving the emergency call will contact the EC. The employee reporting the incident should provide their name, location, nature of the spill, and whether there are injuries involved.

Emergency Coordinator Responsibility

- Direct second-in-command to assume responsibility for continued facility operation or orderly shutdown
- Assess the emergency for affects to human health and the environment and determine location
- If warranted, evacuate all or part of plant (see Appendix 1)
- Contact the Security Office
- Identify the character, source, amount, and extent of any released hazardous material
- Direct personnel to rope-off and/or barricade the spill area
- Notify management
- Determine the appropriate remediation action by reviewing the MSDS. Copies of the MSDS are kept in the main control room, safety office and other right-to-know stations.
- Contact the Emergency Response Team (ERT) for spill containment and clean-up
- If a medical emergency, activate the Emergency Medical Technicians (EMTs)
- If warranted, contact outside contractor or agencies to help with the spill response (See Table 3 and Section 6.0)
- Immediately contact regulatory agencies if hazardous material Reportable Quantity (RQ) is exceeded (See Tables 1 and 2 and Section 4.3).
- Immediately contact regulatory agencies if hazardous waste incident can threaten human health or environment outside the facility (See Table 1 and Section 4.3).
- Fill out Incident Report (see Appendix 2)
- Ensure that waste is cleaned up properly and emergency equipment is cleaned and fit for

its intended use prior to resuming operations in the affected area

- For a hazardous waste incident, contact ADEQ (See Section 4.3) for notification of resumed operations <u>prior</u> to resumption
- Send Incident Report to Manager of Regulatory Affairs and Strategic Projects

Emergency Response Team (ERT) Responsibilities

- Assess the spill and determine the appropriate response (use MSDS for guidance)
- Check MSDS for appropriate personnel protective equipment (PPE) and ensure members don their PPE
- Stop the spill
- Clean-up and contain all hazardous wastes into properly labeled DOT-approved containers
- Contact Environmental for proper disposal of materials

Security Personnel Responsibilities

- Maintain site security
- Contact Safety
- Provide EMT support, if directed
- If directed, contact outside medical help
- Meet and provide directions to the outside contractor or agency providing emergency spill response

Safety Personnel Responsibilities

- Provide EMT support
- Maintain SCBA and respirator equipment
- If required, contact regulatory agencies (See Section 4.4)
- Contact Public Information Officer
- Monitor scene to ensure proper safety practices are followed

4.3 ENVIRONMENTAL REGULATORY REPORTING REQUIREMENTS

The EC or his designee shall <u>immediately</u> notify environmental regulatory agencies for the following releases:

- A release of any quantity of a hazardous waste that could threaten human health or the environment <u>outside</u> the facility, or a RQ release inside the facility (Table 1, Section 2.1)
- A release of a Reportable Quantity (RQ) of a hazardous material (Table 2, Section 2.4)
- For a hazardous waste incident, the EC must also contact ADEQ (listed below) for notification on resuming operations in the affected area <u>prior</u> to resuming operations.

If uncertain of whether an RQ has been exceeded, contact Jim Andrew or Marc Richardson (Table 3). If unable to contact either of the above, report as a *probable* RQ release.

Notify the following environmental regulatory agencies:

NATIONAL RESPONSE CENTER 1-800-424-8802
ADEQ SPILL HOT-LINE 1-800-234-5677

If release is off-site,
LOCAL EMERGENCY PLANNING COMMITTEE, 1-800-362-0812

Give the following information (as is noted in the Incident Report in Appendix 2):

- The name and telephone number of the reporter, and name and address of the facility
- The date, time and type of incident (e.g., spill, fire)
- The name and quantity of the material involved and the amount recovered
- Indicate if the material is an Extremely Hazardous Substance (see Table 2, Section 2.4). If so, provide any anticipated acute or chronic health risks and advice regarding medical attention for exposed individuals (see MSDS).
- The spill location, direction of flow and discharge location
- The media (land, air, water) affected by the spill
- The extent of injuries, if any
- The weather conditions
- The possible hazards to human health or the environment outside the facility
- Whether an evacuation has occurred, or not
- Other agencies notified, or about to be notified

4.4 SAFETY REGULATORY REPORTING REQUIREMENTS

AEPCO's Safety and Loss Control Programs Administrator will report any serious injuries or fatalities. The Occupational Safety and Health Administration (OSHA) must be notified within eight hours for incidents resulting in a fatal accident, or three or more employees being admitted to a hospital (does not include patients treated and released). The Arizona Corporation Commission (ACC) must be notified in writing by the next working day for the following incidents: death; injury requiring off-site medical attention; transportation by ambulance; treatment in emergency room; in-patient hospitalization; or electrical contact.

Report the following:

- Name of employee affected and identification number
- Employee job assignment
- Description of incident
- Medical assistance rendered

4.5 FOLLOW-UP WRITTEN REPORTS

Within 15 days of the reportable spill or release, Environmental shall submit to the LEPC and ADEQ a written report stating and updating the information reported verbally (Section 4.3). The report must also include the following information:

- Name, address and telephone number of the owner or operator
- Date, time and type of incident
- Name and quantity of material (s) involved
- Estimated quantity of material recovered
- The extent of injuries, if any
- Actions taken to respond to and contain release
- Assessment of any known or anticipated acute or chronic health effects to humans
- Assessment of any known or potential hazards to the environment
- Where appropriate, any advice regarding medical attention for exposed individuals

4.6 EVACUATION PLAN

The EC will determine the need for evacuation of the affected area or entire facility. See Appendix 1 for facility evacuation plan.

4.7 POST-EMERGENCY PROCEDURES

The EC is responsible for ensuring that:

- The emergency condition has been resolved
- All waste residue/materials are properly contained
- Emergency equipment used during the emergency are cleaned, restored, or replenished
- The facility is safe for re-occupancy

5.0 EMERGENCY EQUIPMENT LIST

The facility has communications and alarm capabilities at most work locations for reporting the emergency to the EC. In addition, Apache Station has equipment for responding to spills and releases to control and clean up the release.

Communication Equipment

- Gai-Tronics this plant-wide intercom system is the primary emergency communications device. There are stations located throughout the plant. Channel No. 3 is reserved for emergency use.
- Two-Way Radio this system is useful for communicating within a 15-mile radius of the plant. Operations channel is reserved for emergency use.
- Telephone the plant telephone system may be used for emergency communications by dialing 6511 for emergency use only.
- Plant-wide paging system
- Fire alarm pulls
- Automatic fire sensor/alarm/sprinkler systems

Spill Response Equipment

Spill Response Kits

Kits include absorbent socks, pads, protective gloves, tyvek coveralls and floor absorbent. The

kits are contained in 20-gallon gray containers or blue 55-gallon drums. Containers are marked "SPILL KIT". These spill kits are located at the following:

- Gas Turbines 1, 2, 3 and 4
- Gas Turbine 4 agua ammonia tank
- Gasoline and diesel fueling facility
- Steam Unit 1 lube oil room
- Steam Unit 2 lube oil room
- Steam Unit 3 lube oil room
- Steam Unit 2 basement (bulk quantities of spill response equipment)
- RCRA/TSCA/Used Oil waste accumulation area
- Recycling area
- · Heavy Equipment maintenance building
- Steam Units 2 & 3 Precipitators
- Employee Used Oil Tank
- Replacement absorbent material (stored in bulk at the Warehouse)

Personal Protective Equipment and Location

Firehouse Level B Response Suits Tyvek Coveralls Firehouse

 Respirators and Cartridges Firehouse, Warehouse

 Respirators and Cartridges Chemical Protective Boots -Firehouse, Warehouse

 Spill Response Trailer Firehouse Firefighting Turnout Suits Firehouse

Stretchers/Spine Board

- Firehouse
- EMT Van
- Security Office

Eye Wash/Shower Stations

- Water Lab Locker Area
- Reverse Osmosis Building
- RCRA/TSCA/Used Oil Waste Accumulation Area
- Steam Unit 1 Sulfuric Acid Tank
- Steam Unit 1 Battery Room
- Steam Unit 1 Chemical Portable Feed Area
- Steam Unit 1 Water Treatment Area
- Steam Unit 1 Cooling Tower Chlorine Storage Area
- Steam Unit 1 Elevator
- Steam Unit 2 and 3 Sulfuric Acid Tanks Cooling Tower Area
- Steam Unit 2 & 3 Water Treatment Area

- Steam Unit 2 & 3 Battery Room
- Steam Unit 2 & 3 Chemical Portable Feed Area
- Steam Unit 2 & 3 Cooling Tower Chlorine Storage Area
- Gas Turbine 1
- 69 kV Control Building
- Chemical Storage Building
- Warehouse (500 Room)
- Gas Turbine 4 Ammonia Tank Containment
- Gas Turbine 4 Ammonia Forwarding Station

Self Contained Breathing Apparatus (SCBA)

- Firehouse
- Common Control Room
- Water Treatment Lab
- Maintenance Shop
- Response vehicles

First Aid Stations

- Safety Office
- Security Desk

First Aid Kits

- Plant Administration
- Security Office
- All Control Rooms
- SDAS Control Building
- Water Treatment Lab
- Steam Unit 2 Building Ground Floor
- Maintenance Shop
- Chemical Storage Building
- Warehouse
- Heavy Equipment Maintenance Building
- Coal Yard Maintenance Area
- Electrical Shop
- RCRA/TSCA/Used Oil Waste Accumulation Area

Acid Suit Station

Water Treatment Lab

6.0 ARRANGEMENTS WITH EMERGENCY RESPONSE AGENCIES

The Contingency Plan has been distributed to the following agencies that could respond to an emergency situation at Apache Station. In the event of a hazardous waste or materials emergency, the EC must assess the situation for needing outside help. If needed, the EC will immediately contact the following, as appropriate, for assistance:

Agency Te	elephone Number
Sunsites Fire Department 91	1
Cochise County Sheriff's Department 91	1
Sunsites Ambulance 52	20-826-3770
Department of Public Safety Helicopter 80	00 - 247-6337
University Medical Center Air Care 80	00 - 642-7828
Critical Air 80	00 - 247-8326
Life Net Helicopter 80	00 - 642-7828
Northern Cochise Community Hospital 52	20 - 384-3541
Poison Control Center 80	00 - 362-0101
National Response Center 80	00 - 424-8802
EPA Region 9 41	15 - 744-2000
ADEQ Spill Hot-Line 60	02 - 207-2330
Local Emergency Planning Committee 80	00 - 362-0812

Appendix 3 has copies of the letters of intent between the emergency response agencies and Apache Station.

7.0 HAZARDOUS WASTE TRAINING

Personnel, who regularly handle hazardous waste or are on the HazMat ERT, receive initial 40-hour OSHA training and annual 8-hour refresher training. The training is intended to teach personnel to react properly during an emergency situation.

In addition to training employees handling hazardous waste, safety meetings are conducted on a periodic basis for all personnel. These meetings address plant safety and environmental awareness and operational issues.

8.0 AMENDMENTS TO THE CONTINGENCY PLAN

This Contingency Plan is to be immediately amended, under any of the following circumstances:

- Revision to applicable regulations
- Failure of any part of the plan during an emergency
- Changes in design, construction, operation, maintenance, or other circumstances that may change the potential for fires, explosions, or release of hazardous constituents, or changes

the response to an emergency

- Changes of Emergency Coordinators
- Changes of emergency equipment

Whenever significant changes are made to the Contingency Plan, a revised document will be prepared and distributed by certified mail to the appropriate agencies. All affected personnel are to be informed of significant revisions of the plan.

EFFECTIVE DATE: 7/25/2002 RELEASE DATE: 7/25/2002

SUBJECT: EVACUATION PROCEDURE FOR APACHE STATION

APPLICABLE TO: ARIZONA ELECTRIC POWER COOPERATIVE, SIERRA

SOUTHWEST COOPERATIVE SERVICES, AND SOUTHWEST

TRANSMISSION COOPERATIVE

PURPOSE

The purpose of this procedure is to provide guidance for: (1) the evacuation of personnel from Apache Station in the event of a potential or actual emergency; and (2) the prompt notification of those required to respond to the emergency.

REFERENCES

- A. OSHA Standard 1910.38(a)(2)
- B. Apache Station RCRA Contingency and Hazardous Materials Emergency Response Plan

POLICY

In the event of an emergency condition, that could pose risk to Apache Station personnel, an evacuation will be initiated. The Facility Emergency Coordinator (EC) shall make the decision to evacuate all, or part of, Apache Station.

Compliance with emergency condition directives of the Facility EC is mandatory for all personnel.

SCOPE

This procedure applies to <u>ALL</u> personnel at Apache Station, including contractors, vendors, and visitors.

DEFINITIONS

A. <u>Facility Emergency Coordinator (EC)</u> - The Cooperative management person at Apache Station, as designated in the RCRA Contingency and Hazardous Materials Emergency Response Plan. (Normally the Operations Manager/Shift Supervisor.)

- 3. Accounting for personnel in evacuation assembly areas.
- 4. Reporting to the Facility EC the names of those not accounted for.
- 5. In addition the *Evacuation Warden in Assembly Area A* shall coordinate the efforts of all other Evacuation Foremen (using radio tuned to operations channel (channel 3).
 - a. S/he shall also coordinate with the Security Office for on site contractor, vendor, and visitor as well as cooperative employee personnel lists.
 - b. S/he will also keep the EC informed of the status of personnel accounting.

C. The Senior Security Officer on duty shall assist by:

- 1. Providing lists of contractor, vendor, and visitor personnel on site to Evacuation Warden in Assembly Area A.
- 2. Providing up-do-date list of cooperative employees on site to Evacuation Warden in Assembly Area A.
- 3. Assisting as directed by EC.

D. All employees are responsible for:

- 1. Knowing and complying with this procedure.
- 2. Learning exit routes and assembly area(s) in their work areas, and keeping exit routes and assembly areas free of obstacles or other impediments that could slow or prevent prompt evacuation.
- 3. Assisting with the evacuation or search as assigned.

E. The Safety Department is responsible for:

- 1. Knowing and complying with this procedure.
- 2. Periodically reviewing and revising the evacuation procedure.
- 3. Training personnel in evacuation procedures.
- 4. Monitoring and assisting with evacuation operations.
- 5. Posting evacuation plans and assembly area maps.
- 6. Coordinating emergency medical care as required.

3

PROCEDURES

The following actions shall be taken when the Facility EC is notified of a situation that requires evacuation of all or part of Apache Station.

- 1. The Facility EC shall determine the extent of evacuation required and initiate the procedure. His/Her instructions shall also include who shall remain in their work area.
- 2. The Facility EC shall ensure that System Control is notified by dialing extension 5211 if generation may or will be affected.
- 3. If the Facility EC will be pre-occupied with an Operations emergency, he/she shall designate an Alternate EC to direct the evacuation.
- 4. Evacuation Warden shall determine which personnel have not been accounted for in their assembly area. The Evacuation Warden in Assembly Area A shall compile the information from the other assembly areas and Security, and notify the Facility EC.
- 5. The Facility EC may initiate any other required emergency action such as assembly of emergency response teams, and/or activation of emergency plans as warranted by the emergency condition.
- 6. Should someone not be accounted for, the Facility EC shall select personnel to conduct an orderly search. The buddy system shall be implemented for searches and trained emergency response personnel shall be used when possible. All search teams shall carry a radio tuned to operations channel (channel 3).
- 7. The person in charge of the search shall give the Facility EC status updates via operations channel (channel 3) of the radio.
- 8. Safety Department and emergency response personnel, at the direction of the Facility EC, shall assist in the evacuation and the rescue and/or treatment of injured persons.

NOTE: Other personnel not specifically named in this procedure may be called upon to assist, as required.

4

PUBLIC ANNOUNCEMENT OUTLINE

The following emergency announcement will be made on any plant phone by dialing 7600 or on Gai-Tronics, Chanel #3, as required:

Attention all personnel ... This is not a drill! This is not a drill! This is an emergency evacuation notice. It is necessary to evacuate the plant ... Do not use the elevators ... Avoid (specific area) ... Proceed to the nearest evacuation assembly area now.

Use radio operations channel (Channel 3) or Gai-Tronics channel 3 for all emergency communications.

If necessary ... ALL (specify job title(s) ... REMAIN AT YOUR WORK STATIONS.

Make the Announcement in Spanish

Atencion todo personal ... esto no es un ejercicio ... esto no es un ejercidio. Esto es una noticia de evacuacion de emergencia. Es necesario evacuar la planta ... No usen los elevadores ... Eviten (area especifica) ... Procedan a la area de asamblea de evacuacion mas cercana inmediatamente.

APACHE STATION EMERGENCY EVACUATION ASSEMBLY AREAS

EVACUATION ASSEMBLY AREAS

"A" - South of Main Gate

"B" - South of Coal Maintenance Building

"4" - Fire Station

For All Personnel

For All Personnel

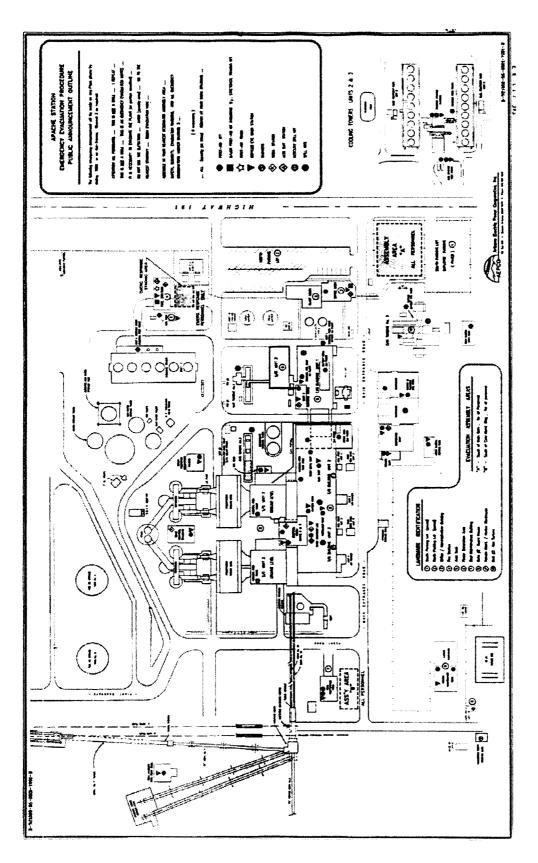
Emergency Response Personnel ONLY

LANDMARK IDENTIFICATION

- 1. South Parking Lot (paved)
- 2. North Parking Lot (paved)
- 3. Office/Administration Building
- 4. Fire Station
- 5. Acid Tank
- 6. Power Generation Area
- 7. Coal Maintenance Building
- 8. Gate #2 Guard House
- 9. Vehicle Maint./Harbor Warehouse
- 10. Unit #3 Gas Turbine

Prepared by Revonda Laws	Safety & Loss Control Programs Administrator	Date
Approved by Mark Schwirtz	Senior Vice President & Chief Operating Officer	Date

ATTACHMENT A



Arizona Electric Power Cooperative, Inc. Apache Station 3525 N. Highway 191 South Cochise, AZ 85606 520-384-4256

1. Reporter name

ENVIRONMENTAL INCIDENT REPORT FORM

2.	Reporter telephone number
3.	Facility name and address
4.	Owner name and address
5.	Date and time of discharge
6.	Name and quantity of substances discharged
7.	Location of incident, direction of flow and discharge location
8.	Source of discharge
9.	Media into which discharge occurred (air, water, land)
10.	Cause of discharge
11.	Damage or injuries caused by discharge
12.	Evacuation needed?
13.	Actions being used to stop, remove, and mitigate the effects of the discharge

Arizona Electric Power Cooperative, Inc. Apache Station 3525 N. Highway 191 South Cochise, AZ 85606 520-384-4256

ENVIRONMENTAL INCIDENT REPORT FORM

- 14. Agencies contacted, or about to be contacted
- 15. Any additional comments:



April 25, 2003

P.O. Box 670 ■ Benson, Arizona 85602-0670 ■

Phone 520-586-3631

Mr. Dan Roe Arizona Division of Emergency Management 5636 East McDowell Road Phoenix, AZ 85008

SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE RE: **STATION**

Dear Mr. Roe:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

I invite representatives of your agency to visit Apache Station to learn about the facility and the emergency response procedures.

Please call me at (520) 384-4256 with any questions or to arrange for a site visit.

Sincerely,

Mark W. Schwirtz

Senior Vice President & Chief Operating Officer

Encl.

c/ Local Emergency Planning Committee

Cochise County Sheriff Department

Northern Cochise Community Hospital

Poison Control Center

Department of Public Safety Helicopter

University Medical Center - Poison Control and Air Care

Critical Air

Life Net Helicopter

Arizona Department of Environmental Quality - Phoenix and Tucson offices

U.S. EPA Region 9

Sunsites Fire Department



April 25, 2003

P.O. Box 670 ● Benson, Arizona 85602-0670 ●

Phone 520-586-3631

Arizona Department of Environmental Quality **Emergency Response Unit** 1110 W. Washington St. Phoenix, AZ 85007

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE **STATION**

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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April 25, 2003

P.O. Box 670 ■ Benson, Arizona 85602-0670 ■

Phone 520-586-3631

Mr. Mike Foster Arizona Department of Environmental Quality 400 W. Congress Suite 433 Tucson, AZ 85701

SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE RE: **STATION**

Dear Mr. Foster:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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Senior Vice President & Chief Operating Officer

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P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

U.S. EPA Region 9 RCRA Compliance/Emergency Response 75 Hawthorne Street San Francisco, CA 94105

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

Mr. Bob Bobar Local Emergency Planning Committee 619 Melody Lane Bisbee, AZ 84603

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Mr. Bobar:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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Sincerely,

Mark W. Schwirtz

Senior Vice President & Chief Operating Officer

Encl.

c/ Sunsites Fire Department

Cochise County Sheriff Department

Northern Cochise Community Hospital

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U.S. EPA Region 9



P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

Cochise County Sheriff's Department 457 South Haskell Ave Willcox, AZ 85653

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services for evacuation and site access control in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

I invite representatives of your agency to visit Apache Station to learn about the facility and the emergency response procedures.

Please call me at (520) 384-4256 with any questions or to arrange for a site visit.

Sincerely,

Mark W. Schwirtz

Senior Vice President & Chief Operating Officer

Encl.

c/ Local Emergency Planning Committee

U.S. EPA Region 9

Northern Cochise Community Hospital

Department of Public Safety Helicopter

University Medical Center – Poison Control and Air Care

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Arizona Department of Environmental Quality - Phoenix and Tucson offices

Arizona Division of Emergency Management

Sunsites Fire Department



P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

Sunsites Fire Department 105 Tracy Street Pearce, AZ 85652

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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Sincerely,

Mark W. Schwirtz

Senior Vice President & Chief Operating Officer

Encl.

c/ Local Emergency Planning Committee

Cochise County Sheriff Department

Northern Cochise Community Hospital

Department of Public Safety Helicopter

University Medical Center – Poison Control and Air Care

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Life Net Helicopter

Arizona Department of Environmental Quality – Phoenix and Tucson offices

Arizona Division of Emergency Management

Sunsites Fire Department



P.O. Box 670 • Benson, Arizona 85602-0670 • Phone 520-586-3631

April 25, 2003

Sunsites Ambulance P.O. Box 412 Pearce, AZ 85625

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your emergency room services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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Sincerely,

Mark W. Schwirtz

Mal W. Ilu

Senior Vice President & Chief Operating Officer

Encl.

c/ Local Emergency Planning Committee

Cochise County Sheriff Department

Arizona Department of Environmental Quality – Phoenix and Tucson offices

Arizona Division of Emergency Management

Department of Public Safety Helicopter

University Medical Center - Poison Control and Air Care

Critical Air

Life Net Helicopter

Northern Cochise Community Hospital

U.S. EPA Region 9

Sunsites Fire Department



P.O. Box 670 ● Benson, Arizona 85602-0670 ● Phone 520-586-3631

April 25, 2003

Northern Cochise Community Hospital 901 West Rex Allen Dr Willcox, AZ 85643

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE

STATION

Dear Sir or Madam:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your emergency room services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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c/ Local Emergency Planning Committee

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U.S. EPA Region 9

Sunsites Fire Department





April 25, 2003

P.O. Box 670 •

Benson, Arizona 85602-0670 • Phone 520-586-3631

University Medical Center Poison Control Center 1501 North Campbell Ave Tucson, AZ 85724

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE **STATION**

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Sunsites Fire Department



April 25, 2003

P.O. Box 670 •

Benson, Arizona 85602-0670 ● Phone 520-586-3631

Mr. Dave Motzkim Life Net Helicopter 3961 E. Speedway, Suite 410 Tucson, AZ 85712

SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE RE: STATION

Dear Sir:

Attached is a copy of the revised RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your emergency transportation services in the event of a release of hazardous waste or material that requires external emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the company's emergency response procedures.

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April 25, 2003

P.O. Box 670

Benson, Arizona 85602-0670 ●

Phone 520-586-3631

University Medical Center UMC Air Care 1501 North Campbell Ave Tucson, AZ 85724

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April 25, 2003

P.O. Box 670 ■ Benson, Arizona 85602-0670 ■

Phone 520-586-3631

Critical Air 4140 Kearney Villa Road San Diego, CA 92123

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE STATION

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U.S. EPA Region 9

Sunsites Fire Department



April 25, 2003

P.O. Box 670 ● Benson, Arizona 85602-0670 ●

Phone 520-586-3631

Department of Public Safety Helicopter P.O. Box 6638 Phoenix, AZ 85005

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Sunsites Fire Department



April 25, 2003

P.O. Box 670 •

Benson, Arizona 85602-0670 • Phone 520-586-3631

Southwest Air Medic Ambulance 6666 South Plumer Tucson, AZ 85706

RE: SUBMITTAL OF RCRA CONTINGENCY PLAN FOR APACHE **STATION**

Dear Sir or Madam:

Attached is a copy of the RCRA Contingency Plan for the Arizona Electric Power Cooperative's Apache Station, located in Cochise. We anticipate using your emergency transportation services in the event of a reportable release of hazardous waste or material that requires additional emergency response resources. Therefore, this plan provides details, for your information, on the hazardous wastes and materials stored on-site, and the emergency response procedures.

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Sunsites Fire Department

APPENDIX 4
Regulatory Cross- Reference Table

SUBJECT	FEDERAL REGULATIONS	CONTINGENCY PLAN SECTION
Contingency Plan requirement for fires, explosions or sudden releases of hazardous waste or constituents	40 CFR 265.51	Entire Plan
Plan must describe actions taken to respond to fires, explosions or sudden releases of hazardous wastes or constituents.	40 CFR 265.52 (a)	4.1, 4.2
Contingency Plan may be incorporated into existing SPCC Plan	40 CFR 265.52 (b)	N/A
Arrangements made with fire department, hospital, contractors and emergency response teams.	40 CFR 265.37 40 CFR 265.52 (c)	6.0
List of persons qualified to act as emergency coordinator.	40 CFR 265.52 (d)	Table 3
List of emergency equipment and discussion of capability.	40 CFR 265.52 (e)	5.0
Evacuation procedures	40 CFR 265.52 (f)	4.6, Appendix 1
Distribution of Contingency Plan	40 CFR 265.53	1.0, 6.0, Appendix 3
Amendment of Contingency Plan	40 CFR 265.54	8.0
Emergency coordinator responsibilities	40 CFR 265.55	4.1, 4.2
Emergency Response Procedures	40 CFR 265.56	4.1, 4.2, 4.3, 4.7